

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

SARAH,

Plaintiff,

v.

Google LLC, YouTube LLC, James
JACKSON, also known online as “ONISION,”
and LUCAS JACKSON, formerly known
online as “LAINEYBOT,” “LAINEY” and
“KAI,”

Defendants.

CASE No: 1:23-cv-00223-HYJ-SJB

HON. HALA Y. JARBOU

**DEFENDANTS GOOGLE LLC AND YOUTUBE, LLC’S BRIEF IN SUPPORT OF
UNOPPOSED MOTION TO EXTEND REPLY BRIEF DEADLINE**

INTRODUCTION AND RELEVANT FACTUAL BACKGROUND

The parties have been working amicably throughout this litigation, including in the sister case currently pending in the Middle District of Florida.

Based on the date on which Plaintiff's Response in Opposition to the Motion to Dismiss was filed and the timing requirements of L.R. 7.2(c), Defendants' Reply in Support of their Motion to Dismiss would be due on July 5, 2023. However, Defendants' counsel have multiple conflicts including pre-planned family vacations. Defendants seek only a brief extension of nine days, which encompasses a Court holiday. Plaintiff does not oppose this request. At the time of this filing, a Case Management Order has not yet been entered. No other deadlines will be affected by a grant of Defendants' Motion. Accordingly, Defendants respectfully request an extension from July 5, 2023 to July 14, 2023 to file their Reply Brief in Support of their Motion to Dismiss.

LAW AND ARGUMENT

I. GOOD CAUSE EXISTS TO EXTEND THE DEADLINE TO FILE THE REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS.

The Court has the discretion to modify the deadlines in this case. *See* Fed. R. Civ. P. 16(b)(4). Given the circumstances described above, there is good cause to extend the deadline by which Defendants must file their Reply Brief in Support of their Motion to Dismiss. "The primary measure of Rule's 16's 'good cause' standard is the moving party's diligence in attempting to meet the case management's order's requirements[]." *Smith v. Holston Med. Grp., P.C.*, 595 F. App'x. 474, 477 (6th Cir. 2014). Defendants have been diligent in complying with applicable deadlines, and the parties have been working together amicably throughout this litigation. Defendants are now requesting only an additional 9 days by which to submit their Reply in Support of Motion to Dismiss.

CONCLUSION AND RELIEF REQUESTED

WHEREFORE, Defendants Google LLC and YouTube, LLC respectfully request that this Honorable Court grant its Motion to Extend Reply Brief Deadline and extend the deadline until July 14, 2023.

Respectfully Submitted,

Clark Hill PLC

By: /s/ Christopher M. Trebilcock
Christopher M. Trebilcock
500 Woodward Avenue, Suite 3500
Detroit, Michigan 48226
ctrebilcock@clarkhill.com
(313) 965-8300

DATE: June 22, 2023

**Wilson Sonsini Goodrich & Rosati
Professional Corporation**

By: /s/ Brian M. Willen
Brian M. Willen
Benjamin Margo
1301 Avenue of the Americas, 40th Floor
New York, NY 10019-6022
(212) 999-5800
bwillen@wsgr.com
bmargo@wsgr.com

DATE: June 22, 2023

*Attorneys for Defendants
GOOGLE LLC and YOUTUBE, LLC*

CERTIFICATE OF COMPLIANCE WITH LCivR 7.2(b)(i)

I hereby certify that the foregoing brief contains 329 words per the Word Count function in Microsoft Word (Version 2202), not including the case caption or the signature block.

By: /s/ Christopher M. Trebilcock
Christopher M. Trebilcock

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2023, I caused the foregoing paper to be electronically filed with the Clerk of Court using the ECF system, which will send notification to counsel of record.

/s/ Christopher M. Trebilcock
Christopher M. Trebilcock